

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Miyano Machinery USA Inc.,)	
)	
Plaintiff,)	
)	
vs)	Civil Action No. 08 C 526
)	
MiyanoHitec Machinery, Inc.,)	Hon. Virginia Kendall
Thomas ("Tom" Miyano, a/k/a)	
Toshiharu Miyano and Steven)	Magistrate Judge Nolan
Miyano, a/k/a Shigemori Miyano,)	
)	
Defendants)	JURY TRIAL DEMANDED
<hr style="width: 45%; margin-left: 0;"/>		
MiyanoHitec Machinery, Inc.,)	
Thomas ("Tom" Miyano, a/k/a)	
Toshiharu Miyano and Steven)	
Miyano, a/k/a Shigemori Miyano,)	
)	
Counterclaimants,)	
)	
vs)	
)	
Miyano Machinery, Inc., and)	
Miyano Machinery USA, Inc.,)	
)	
Counterdefendants.)	

NOTICE OF MOTION

To counsel of record as indicated on the attached service list:

Please Take Notice, that on Thursday May 15, 2008, at 9:00 a.m., or as soon thereafter as counsel may be heard, Defendants, Counterclaimants MiyanoHitec Machinery, Inc., Thomas Miyano and Steven Miyano shall appear before the Honorable Magistrate Judge Nan R. Nolan in the courtroom usually occupied by her in the United States District Court for the Northern District of Illinois, Eastern Division, 219 S. Dearborn Street, 18th Floor, Chicago, Illinois, and then and there present said Defendant/Counterplaintiff's MOTION TO COMPEL PRODUCTION,

TO PIERCE CLAIMED ATTORNEY-CLIENT AND WORK PRODUCT PRIVILEGE AND TO
ENFORCE SUBPOENA FOR DEPOSITION.

DATED: May 14, 2008

Respectfully submitted,

/s/ Robert M. Karton
Robert M. Karton
ROBERT M. KARTON, LTD.
77 W. Washington St., Ste. 900
Chicago, IL 60602-2804
(312) 214-0900 telephone
(815) 301-9114 facsimile
robert@karton.us

Vernon W. Francissen
FRANCISSEN PATENT LAW, P.C.
53 W. Jackson Blvd., Ste. 1320
Chicago, IL 60604
(312) 294-9980 telephone
(312) 275-8772 facsimile
vern@francissenpatentlaw.com

Geoffrey A. Baker
Anthony E. Dowell
Geoffrey D. Smith
DOWELL BAKER, P.C.
201 Main Street, Ste. 710
Lafayette, IN 47901
(765) 429-4004 telephone
(765) 429-4114 facsimile
gabaker@dowellbaker.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing NOTICE OF MOTION and related MOTION were filed via the Court's ECF system and thus also sent by email on May 14, 2008, to the following:

Edward D. Manzo
Louis Alex
Jason Smalley
COOK, ALEX, MCFARRON, MANZO, CUMMINGS & MEHLER, LTD.
200 W. Adams Street, Suite 2850
Chicago, IL 60606

(312) 236-8500 telephone
(312) 236-8176 facsimile

emanzo@cookalex.com
laalex@cookalex.com
jsmalley@cookalex.com

Steven L. Katz
Nancy Sasamoto
George Kobayashi
Masuda, Funai, Eifert & Mitchell, Ltd.
203 N. LaSalle Street, Suite 2500
Chicago, IL 60601-1262

(312) 245-7500 telephone
(312) 245-7467 facsimile

skatz@musadafunai.com
nsasamoto@masudafunai.com
gkobayshi@masudafunai.com

DATED: May 14, 2008

/s/ Robert M. Karton